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October 3, 2020

The Honorable Jed S. Rakoff
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Weigand & Akhavan*, 20 cr. 188 (JSR)

Dear Judge Rakoff:

On behalf of Defendant Ruben Weigand, as directed by the Court at yesterday's bail hearing, we write to advise the Court of the bail conditions we propose to ensure Mr. Weigand's appearance at trial:

- 1) Mr. Weigand will sign a \$3 million personal recognizance bond, secured by \$470,000 in cash collateral provided by Mr. Weigand's close friends and family, and seven financially responsible co-signers who are prepared to sign the bond to the extent of \$1.15 million.
- 2) Mr. Weigand will be transported from California to New York by plane under the supervision of the U.S. Marshals or a private security service, at his own expense, and escorted to a rented apartment in New York.
- 3) In New York, pending trial, Mr. Weigand will remain in an apartment in Manhattan rented at his expense at all times of day and night, but may leave to meet his counsel at their New York office under the supervision of armed security guards. Any other exceptions must be authorized by this Court, in writing, in advance.
- 4) Mr. Weigand's detention in the rented apartment will be secured at all times by on-premises armed security guards, paid for by Mr. Weigand.
- 5) Mr. Weigand will give his express consent in writing to the use of reasonable force by the armed security guards to thwart any attempt to flee.
- 6) With the exception of Mr. Weigand's counsel, who will be permitted to visit Mr. Weigand freely, any visitors for Mr. Weigand will require pre-approval by Pre-Trial Services.

- 7) Mr. Weigand will be subject to strict supervision by Pre-Trial Services and electronic GPS monitoring.
- 8) Mr. Weigand will execute a waiver of his right to challenge extradition from both Germany and Luxembourg.
- 9) Mr. Weigand's German passport, his only travel document, is in the possession of U.S. authorities. The German Missions in the United States have agreed not to issue Mr. Weigand a new passport pending trial. Mr. Weigand has also executed and delivered to the German Consulate a declaration confirming that he will not apply for a passport if he is released on bail. *See* ECF No. 98-1 at 6.

We respectfully submit that the proposed bail conditions above will mitigate any risk of flight and ensure Mr. Weigand's appearance at trial.

Respectfully submitted,

/s/ Andrew J. Levander

Andrew J. Levander

CC (via ECF): AUSA Christopher J. DiMase
AUSA Nicholas S. Folly
AUSA Tara LaMorte